APPENDIX D-1: FINDING OF NO SIGNIFICANT IMPACT (FONSI)

FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR WEST ROBINS HOUSING PRIVATIZATION PROJECT ON ROBINS AIR FORCE BASE, GA

September 1998

WR-ALC/EMX 216 OCMULGEE CT. ROBINS AIR FORCE BASE, GEORGIA

Finding of No Significant Impact (FONSI) for West Robins Housing Privatization Project on Robins Air Force Base, GA

Agency: United States Air Force, Environmental Management Directorate (WR-ALC/EM), Robins Air Force Base (RAFB), GA.

Action: Finding of No Significant Impact (FONSI). As required by Section 1508.13 of the Council on Environmental Quality (CEQ) regulations, a FONSI is the required document that must follow an Environmental Assessment (EA) when the responsible official determines that impacts will not be significant. Based on the following summary of effects (as discussed in the attached EA), the Proposed Action will not have significant short- or long-term effects. For this reason, no environmental impact statement needs to be prepared.

Summary of Proposed Action: RAFB plans to relinquish ownership of West Robins to the private sector as part of a third-party financing agreement for the construction of new RAFB housing. RAFB would retain the on-base housing on East RAFB. The City of Warner Robins is willing to exchange 85.46 acres of unimproved land, located east of West Robins, for acreage (currently set at 68 acres) on the northern edge of the existing West Robins tract.

The project scope of 666 units includes replacing 370 Wherry/Chapman housing units (constructed between 1951 and 1953; dilapidated and economically infeasible to rehabilitate, four of which have been recently demolished); and renovating, or replacing, 300 Hillside housing units (built between 1964 and 1966). The project includes an option to build 90 additional housing units to reduce the RAFB current housing deficit of 99 units, which is projected to increase to 132 units by 2002 (RAFB Business Plan to Privatize West Robins AFB Housing, 1997).

The solicitation for this project will be issued 60 days following Congressional notification, and is scheduled to proceed as indicated in the Milestones Table on the following page.

Details of the Proposed Action, and other alternatives considered, are contained in the attached EA. For further information, questions may be directed to:

Mr. Martin Matragrano
WR-ALC/EMX
216 Ocmulgee Court
Robins Air Force Base, GA 31098-1646

21 Dec 98

Telephone: (912) 926-1197, x111

Milestones

Issue Solicitation	X
Site Visit	X + 7
Phase I Qualifications Due	X + 21
Phase I Other Submittals	X + 45
Request Phase II Submittals	Y
Phase II Submittals Due	Y + 60
Select from Phase III	Z
Congressional Notification	Z + 7
Award	Z + 30

Purpose and Need for the Proposed Action: At current traditional MILCON funding levels, it would take 22 years to renovate, or replace, the necessary RAFB housing inventory and make up for 90 of the 132 deficit units. At this time, many houses on East Robins have been without major renovation for 27 years. Combining traditional funding and privatization, RAFB can renovate, or replace, its entire inventory within nine years. For this reason, and because West Robins is separate from the rest of the base, RAFB seeks to retain housing on the east side of the base and privatize West Robins.

The RAFB housing goal is to provide military families access to safe, quality, affordable housing, supported by a quality education system, in a community where they will choose to live. The housing market in Warner Robins has seen significant growth in both homeowner and rental units, with increasing demand in these two categories. Price pressure and builder's tendencies to build for higher price markets have made rental properties difficult to find for lower grade personnel with lower housing allowances. In addition, the area surrounding West Robins is constrained by blight and crime. Both the blight and the crime are major concerns to military families and to the City of Warner Robins. RAFB, the City of Warner Robins, and Houston County are actively working as partners in creating a targeted redevelopment plan to ensure West Robins and surrounding properties are redeveloped in a manner complementary to one another.

Alternatives Removed from Further Consideration: Four alternatives were removed from consideration: 1) Redevelop West Robins (no land exchange), 2) Off-base construction alternative, 3) MILCON construction, and 4) No-action alternative.

Redevelop West Robins – no land exchange (a. MILCON, b. Privatize): By redeveloping West Robins by either the use of MILCON funds or by conveying to a contractor for privatized development, the environmental impacts for construction on West Robins would be the same. Therefore, for NEPA purposes, they are grouped together.

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- a. MILCON. Under this redevelopment alternative, Robins would retain ownership of West Robins and would seek MILCON funds for demolition, construction, and renovation of military family housing. As stated earlier, by using traditional MILCON funding, it is projected that it would take 20 years or more to complete the military family housing project. The excessive time required for completion would compound the chronic shortage of military family housing for years to come. Further, this alternative would not result in any net gain of military family housing. Therefore, this alternative was eliminated from further review.
- b. Privatize. This alternative would redevelop West Robins (without a land exchange) by conveying West Robins to a developer for demolition, construction, and renovation of military family housing. The substandard state of the Wherry/Chapman housing requires that they be addressed prior to renovation of the Hillside housing. Because demolition of the Wherry/Chapman units would have to occur before any new construction could begin, there would be a resulting displacement of military families. The presence of asbestos and lead from housing unit building materials, as well as necessary upgrades to roads, drainage, water, and sewer to meet local zoning codes, would delay construction time. Because this alternative does not address the projected housing deficit (no net gain of housing units), there will be an ongoing need for off-base housing. The project requirement for fewer units per acre will cut into excess real estate on West Robins, including opportunity sites with greater potential than for housing. Further, this alternative does not improve the security of the family housing as it will abut the blighted areas (Robins military families have raised this as their primary concern). In addition, this alternative would not contribute to the city's redevelopment efforts, because no land would be provided for a central recreational facility and a new fire station. For these reasons, this alternative was removed from consideration.

Off-Base Construction Alternative: This alternative would include conveying West Robins to the developer and constructing privatized housing elsewhere off-base. Neither the short- nor long-term impacts of this alternative can be fully evaluated until a potential off-base site is identified; however, this site would have to be environmentally sound and equal to the Proposed Action. Site selection and the required environmental analysis of the proposed site would substantially delay the start of construction. In addition, military personnel may still be forced to compete with local families for a limited supply of available base housing, and this alternative would not contribute to the city's redevelopment efforts. For these reasons, this alternative was removed from consideration.

MILCON Construction: This alternative entails constructing MILCON on a 78-acre tract of undeveloped land located immediately south of Luna Lake, in the southeastern portion of the base. This alternative would result in the loss of recreational facilities and wildlife from the currently forested area, and would not contribute to the city redevelopment. Construction would replace only 300 of the 370 Wherry/Chapman Housing units slated for demolition, and would not address either the needed renovation of the Hillside units, nor the housing deficit. In addition, because of the presence of LF03 to the north of the site, and the skeet shooting range in the southern portion of the site, the impacts to environmental justice are deemed negative in both the short and long term. For these reasons, this alternative was removed from consideration.

No-Action Alternative: Under this alternative, privatization would not occur, and no housing would be constructed 21 Dec 98

or renovated. The housing needs of military personnel would not be addressed, forcing many military families assigned to the base to compete with local families for a limited supply of available off-base housing, resulting in increased off-base housing costs. This alternative would also not contribute to the city redevelopment, and could potentially have a negative synergistic impact on the city, depending on how closely developers are controlled in how they respond to the increased need for public housing. For these reasons, this alternative was removed from consideration.

Summary of Environmental Impacts: The EA evaluated the potential short- and long-term impacts of the Proposed Action on the following resources: water (surface and ground water); biological resources (wildlife, vegetation, threatened and endangered species, and wetlands and sensitive habitats); soil; cultural resources; air quality; access/transportation; noise; utilities (drinking water, sanitary sewer, electrical, and natural gas systems, and fire protection); aesthetics and recreation; socioeconomics; hazardous waste; land use; and environmental justice. Cumulative and synergistic impacts from implementing the Proposed Action were evaluated in the context of other past, present, or reasonably foreseeable future actions at RAFB.

A detailed analysis of the environmental consequences of the Proposed Action (EA, Section 4.0) indicated that there would be no short- or long-term impacts on the following resources: ground water, threatened and endangered species, wetlands and sensitive habitats, cultural resources, drinking water, sanitary sewer system, electrical system, natural gas system, land use, or environmental justice. It should be noted, that although a small jurisdictional wetland (50 feet by 10 feet) was identified in a drainage swale on the city property, it is less than one acre in area and is completely contained within the Georgia Power easement; it should not pose a negative short- or long-term impact on the Proposed Action.

Negative, but insignificant, short-term impacts (no long-term impacts) would affect the following resources:

Soil Resources: The proposed action will not result in a change in land use within the existing boundaries of West Robins. The proposed demolition and construction disturbances will occur in areas already occupied by structures and/or roads and utilities; virtually no areas having native soil profiles will be affected. The construction of housing units and associated structures on the city property represents a substantial change in land use from agricultural to urban. Short-term minor erosion from wind and stormwater runoff can be expected during construction of the project. Potential short-term impacts arising from soil disturbances in both West Robins and the city property could occur in the form of siltation in receiving streams. These short-term impacts can be minimized by the careful implementation of an erosion control program (best management practices, e.g., installation of silt fencing, terracing, and retention ponds in accordance with the Soil Erosion Permit) during construction.

Air Quality: Implementation of the Proposed Action would result in a temporary increase of particulate matter (i.e., fugitive dust created by heavy equipment and construction activities), as well as emissions from heavy equipment operating and from trucks hauling materials to and from the site. These negative impacts would be short-term and limited to the local areas.

Noise: Near-term noise impacts from construction activities will be felt by nearby residences, businesses, base employees, and Memorial Park users during daytime hours until the Proposed Action is completed. The degree to which each of these will be affected is largely dependent on their proximity to the construction activities. It is expected that noise levels from construction and demolition activities can be held below a maximum of 55 dBA.

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Following construction, the noise environment is not expected to vary substantially from current conditions at West Robins.

Fire Protection: Under the Proposed Action, all privatized housing and land turned over to the developer will require fire protection from the Warner Robins Fire Department. This will impact the current Fire Districts established by the city; however, a new fire station may be constructed on the tract of land that is exchanged and given to the city. Therefore, the increased burden on fire protection facilities may be significant in the short term, but will be insignificant in the long term. If a new fire station is not constructed, then alternate measures, such as increased personnel and vehicles, may be added to the existing fire station.

The following resources would experience short-term negative, but long-term positive impacts:

Access/Transportation: The most substantia12l increase in traffic from the Proposed Action would be the short-term increase in vehicular traffic during site preparation and construction. Traffic flow to West Robins would increase substantially over the short term; however, establishing an alternate construction entrance would alleviate much of the congestion. The city property will require the construction of a road system early in the project. By providing access via Wellborn Road, which is not heavily traveled, congestion will be minimized for area residents.

Plans are already in progress to improve traffic flow through West Robins, including both east/west and north/south connectors, which will complement the city-planned redevelopment surrounding the area. With careful road planning and development, overall traffic patterns and access could be improved for the entire area.

Aesthetics and Recreation: Implementation of the Proposed Action would have a negative impact on aesthetics during site preparation and construction activities. The city property will be converted from open field and forested areas to an urban development, eliminating the pastoral setting that currently exists in the immediate area. A similar area remains on the adjacent tract bordering the southern edge of the property, leaving some of the rural atmosphere intact, and trees will be planted. Additionally, the construction plan includes landscape planting once the site has been cleared and contoured. The species list for landscape planting has not yet been finalized (funds go to EMX if programmed a year in advance); impacts to vegetation would be lessened if the list includes as many presently occurring native species as possible.

However, West Robins also includes a convenience store with a gas station, youth center, soccer and softball fields, parks and playgrounds, an olympic size swimming pool, and tennis and basketball courts, all of which will be conveyed as part of the proposed housing complex. In addition, current recreational activities would be supplemented by sidewalks facilitating walking and jogging through the neighborhoods, and a park which would include an open play area, basketball court, picnic tables, and children's play structures. These facilities represent significant recreational assets for the proposed housing community. Therefore, the Proposed Action would have a negative impact in the short term, and a net positive impact in the long term.

The following resources would experience both short- and long-term negative impacts; however, the magnitude of the impacts has been deemed insignificant:

Surface Water: Because there are no perennial surface water bodies on either the West Robins or city properties, no on-site water quality issues will result as a consequence of the Proposed Action. Any effects on perennial surface waters would potentially be experienced by receiving streams and lakes downstream on the main RAFB reservation.

The construction of buildings, roads, and other impermeable areas associated with housing areas usually increases the long-term contribution of stormwater to drainage systems. Stormwater runoff can potentially create flooding problems along with the degradation of water quality in receiving streams. Stormwater runoff from West Robins and the city property will continue to be channeled into the existing drainage course which flows eastward out of West Robins, along the northern border of the city property, and onto the main base. For the Proposed Action, the replacement or renovation of housing units within the existing West Robins housing area will not result in a substantial net increase in impermeable surfaces. Consequently, this portion of the Proposed Action is not expected to substantially increase stormwater runoff contributions and attendant consequences in the drainage course. Moreover, the improvement of the stormwater drainage system to meet current requirements will improve drainage capacity and minimize water quality effects.

The construction of new housing units, streets, driveways, and other paved areas on the city property will increase the contribution of stormwater to the existing drainage course bordering the northern edge of the property. During precipitation events, surface runoff from both the existing West Robins housing area and the proposed city property development will combine to increase loads on receiving streams.

The long-term impacts of the Proposed Action will be to challenge the capacity of the drainage course to accept increased loads without flooding. Installation of additional stormwater handling and retention structures, along with improvements to drainage channels, will minimize these impacts. Best management practices (silt fencing, temporary retention ponds, and surface contouring) and adherence to sediment and erosion control requirements that will be implemented during the course of demolition and construction will ensure that off-site sediment movement does not occur. Although the Proposed Action may result in negative short- and long-term effects, these effects can be minimized with appropriate engineering controls.

Wildlife: No threatened or endangered animal species are known to inhabit either West Robins or the city property. None of the actions planned for the West Robins tract should impact the wildlife on that property. On the city property, species such as the coyote and redtail hawk will be displaced from their current habitats, inducing their migration into the adjacent vacant lands to the south. The long-term impact of the Proposed Action will be to further reduce the available habitat for species currently inhabiting the city property.

Vegetation: Implementation of the Proposed Action would not substantially alter the composition of natural and domestic plant communities within the existing West Robins housing area. Demolition and replacement of housing units will result in the short-term removal of existing domestic plant species including shrubs, grasses, and selected trees. However, these species will be replaced following construction, and no long-term impacts to vegetation in the existing West Robins housing area are expected.

The construction of housing units on the city property will result in the complete removal of existing plant communities. There is currently approximately 30 acres of forest and 55 acres of farmland and easements. Sites for housing units, roads, and utilities will initially be cleared of vegetation before construction begins, leaving these areas temporarily clear of vegetation. Existing plant communities will be largely replaced by artificially

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landscaped communities of indigenous and domestic species of trees, shrubs, and grass. The long-term impacts from these activities would be lessened by including as many indigenous species as possible.

Positive impacts, in both the short- and long-term, would be experienced by the following resources:

Socioeconomics: The short-term labor demands for construction-related activities required by the Proposed Action would be met by the Warner Robins/Macon/Atlanta regional economy. There would be no significant increase in long-term labor demands following construction. The Proposed Action would satisfy the current and the majority of the projected (2002) deficit in available military family housing at the base. Without this action, many military families assigned to the base would be forced to compete with local families for a limited supply of available off-base housing. This competition would result in increased off-base housing costs. In addition, this alternative would contribute to the city's redevelopment efforts. Therefore, implementation of this alternative would have a positive impact on the socioeconomics of the base and the surrounding areas in both the short and the long term.

Hazardous Waste: For the Proposed Action, there are no known sources of hazardous waste on either West Robins or the city property. The demolition of housing units containing lead-based paint and asbestos will require special handling and disposal according to Federal, State, and local regulations. Special procedures implemented as a part of demolition will ensure that nearby residents are not exposed to lead or asbestos-bearing dust. The long-term effects of this action would be positive, because it would reduce the risk of residents living in houses with asbestos and lead-based paint.

Cumulative and Synergistic Impacts: The Proposed Action requires the irretrievable commitment of the majority of the biological resources on the proposed construction site. For instance, potential future timber harvests on the current city property would be impossible as long as the proposed housing units were present on the site, and most of the currently available wildlife habitat would be lost. These impacts, however, are not considered to be significant given the absence of threatened or endangered plant or animal species and that the land is currently disturbed from timber harvesting.

Additionally, there would be a loss in the available land used for recreational purposes (the city is currently using some on the land near Memorial Park as soccer fields) after constructing houses on the city property. This would be offset by the city's plan to utilize a portion of the land received to construct a centralized recreational area.

The city may also construct a fire station on the property they receive because of the increase in the size of and building density in their fire district. The cost of building and maintaining this facility would be offset by the increase in revenue generated by the additional houses built in the city limits.

The construction and renovation of houses in the area will improve the overall appearance and value of the neighborhood. Furthermore it will ensure that the homes and utility services are in accordance with current building codes, offering a safer place to live. The addition of residents will improve the economic stability of the existing and potentially new businesses built on the opportunity sites. Having a high occupancy rate in the neighborhood should diminish the blight and crime that currently exists in the area.

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There will be no environmental justice impacts as there will be no disparate impacts to minorities or low-income communities in either the development area or in the surrounding community. The communities will not be subjected to any significant negative environmental effects from the demolition and construction of housing. The communities will not be exposed to hazardous materials. Asbestos and lead contaminated building materials will be disposed of in accordance with federal, state, and local laws. Noise impacts from construction activities are not deemed significant. Further, the project is anticipated to have beneficial economic impacts by contributing to the redevelopment of the area, improving access to government services, and increasing property values.

The overall cumulative and synergistic impacts, as a result of known past, present, or reasonably foreseeable actions, are deemed positive for the Proposed Action.

Approval: After careful and thorough consideration of the facts contained herein and in the attached EA, I conclude that the proposed West Robins Housing Privatization Project at Robins Air Force Base, Georgia, is consistent with existing national environmental policies and objectives as set forth in NEPA, and that it will not significantly affect the quality of the human environment. Therefore, an Environmental Impact Statement (EIS) is not required, and I endorse the Finding of No Significant Impact (FONSI).

APPENDIX D-2: ENVIRONMENTAL BASELINE SURVEYS – EXECUTIVE SUMMARIES ONLY – SEE HOUSING PRIVATIZATION WEBSITE FOR COMPLETE ELECTRONIC VERSIONS OF BOTH ENVIRONMENTAL BASELINE SURVEYS AND THE ENVIRONMENTAL ANALYSIS FOR THIS PROJECT

Revised

ENVIRONMENTAL BASELINE SURVEY FOR THE CONVEYANCE OF APPROXIMATELY 300 ACRES LOCATED AT WEST MILITARY FAMILY HOUSING COMMUNITY COMPLEX WARNER ROBINS, GA

Chevron Village Housing Community
Hillside Housing Community

March 1998

Prepared for:

WR-ALC/EMX 216 OCMULGEE CT. ROBINS AIR FORCE BASE, GEORGIA

Prepared by:

GEOPHEX, LTD. 605 MERCURY ST. RALEIGH, NC 27603

Executive Summary

This report presents the findings of an Environmental Baseline Survey (EBS) of the Robins Air Force Base (RAFB) West Military Family Housing Community Complex (West Robins Housing) conducted on behalf of Environmental Management Directorate - Environmental Resources and Planning Division (EMX). The purpose of the survey is to identify any environmental concerns that might be associated with the transfer of West Robins to private interests. The survey substantially follows the format and methodology of Air Force Instruction *AFI-32-7066*: *Environmental Baseline Surveys in Real Estate Transactions*. AFI 32-32-7066, in turn, incorporates guidelines issued by the American Society of Testing and Materials standards 1527-93 and 1528-93 which define standard practices for conducting Phase I Environmental Site Assessments for real estate transactions. This report updates an earlier version of this EBS issued in May 1997. This update includes the results of additional lead testing of soils by RAFB in the subject area.

The West Robins EBS is based on: 1) a review of existing RAFB records, 2) interviews with RAFB and local officials, 3) on-site inspections of West Robins, and 4) database retrievals from government and third party sources. This survey considers all buildings, structures, grounds, and the environment within the boundaries of the government property. It also identifies specific areas of environmental concern that exist around the site perimeter, and within a two-mile radius extending from the center of the property.

West Robins is located 1,200 feet west of the main RAFB installation, in the southeastern portion of the city of Warner Robins. RAFB records and historical archives indicate that the US government acquired the property from private interests between 1940 and 1943. The property remained under government ownership and use throughout World War II, serving as an off-base housing area for civilian and enlisted personnel.

At least two generations of housing have existed on site. The first, constructed during World War II, consisted of 56 barracks located in what is now the northern Chevron Village portion of the property. These buildings were demolished in the late 1950s and replaced with the current group of individual and duplex housing units that occupy the northern two-thirds of the property. A second housing complex, called Hillside Housing Complex, was added to the southern third of the property in the 1960's. The West Robins Housing Complex has also been referred to as the "Wherry Housing" complex for the Wherry Housing Act that mandated the provision of housing by the government for military personnel.

The results of the EBS are as follows:

- A search of Federal, State, and local records for West Robins Housing revealed no Notice of Violations (NOVs) or other environmental violations.
- No hazardous substances or petroleum products have been released into the environment on West Robins. However, the presence of asbestos and lead in

- housing unit building materials will require special treatment, handling, and disposal if the units are repaired or demolished.
- Petroleum products are stored in underground storage tanks (USTs) at the Army/Air Force Exchange Service (AAFES) gas station located in the Chevron Village Housing Complex. Although no releases from the USTs have been reported, operation and/or demolition of the tanks will require adherence to Georgia UST regulations. These tanks are registered with the State of Georgia.
- Chlorine gas is stored at a potable water treatment facility located across from Linwood Elementary School.
- PCBs may exist in the ballast portion of fluorescent lighting fixtures throughout the entire housing complex.
- A third-party database retrieval from State and Federal agencies identified fifty-one sites of environmental concern within a two mile radius of the center of West Robins. These include US Environmental Protection Agency (US EPA) National Priority List (NPL) Sites; US EPA Resource Conservation and Recovery Act (RCRA) permitted treatment, storage, or disposal facilities; Comprehensive Environmental Recovery Compensation and Liability Investigation Sites (CERCLIS); State UST/aboveground storage tank (AST) sites; US EPA Emergency Response Notification System (ERNS) spills; and RCRA small or large generators.

None of the hazardous substances (asbestos, lead, PCBs, and chlorine gas) identified in this EBS, mitigates the conveyance of this property. However, these substances are either being used on-site, or are constituents of on-site buildings. All of the above substances are under active management and control of RAFB and no further action is required unless the structures are demolished or repaired in a manner that disturbs the affected materials. In the event the buildings are slated for demolition, the cost of removing, transporting, and disposing of the hazardous materials should be carefully considered.

AFI 32-7066 specifies that "any disposal by deed of property owned by the Federal government on which any hazardous substance was stored for one year or more, known to have been released, or disposed of is subject to the requirements of Section 120(h)(3) of CERCLA." A follow-up investigation of soils potentially contaminated by lead based paint determined that lead from exterior paint had been deposited into site soils. However, because site testing indicated that lead concentrations are below action levels established by the United States Environmental Protection Agency (EPA) and United States Department of Housing and Urban Development (HUD), the West Robins Housing Complex can be categorized under Category 3 as defined in AFI 32-7066 (Section 2.1.3.5). Under this classification, the conveyance can proceed. However, prospective buyers and/or tenants must be informed of the presence of, and risks associated with, lead based paint as prescribed under Section 1018 of Title X of the 1992 Housing and Community Development Act.

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ENVIRONMENTAL BASELINE SURVEY FOR THE CITY OF WARNER ROBINS PROPERTY TO BE EXCHANGED IN THE WEST ROBINS HOUSING PRIVATIZATION PROJECT ON ROBINS AIR FORCE BASE, GA

April 1998

Prepared for:

WR-ALC/EMX 216 OCMULGEE CT. ROBINS AIR FORCE BASE, GA

Prepared by:

GEOPHEX, LTD. 605 MERCURY ST. RALEIGH, NC 27603

Executive Summary

Robins Air Force Base (RAFB) plans to relinquish ownership of its West Robins Military Family Housing Community Complex (West Robins) to the private sector, as part of a third-patry financing agreement for the construction of new RAFB housing. This report presents the findings of an Environmental Baseline Survey (EBS) of the City of Warner Robins (City) property to be exchanged as part of the West Robins Housing Privatization Project. The EBS was conducted on behalf of the Environmental Management Directorate - Environmental Resources and Planning Division (EMX). The purpose of the survey is to identify environmental concerns associated with the transfer of this City property to RAFB and, subsequently, to private interests. The survey substantially follows the format and methodology of Air Force Instruction AFI-32-7066: Environmental Baseline Surveys in Real Estate Transactions. AFI 32-7066, in turn, incorporates guidelines issued by the American Society of Testing and Materials, standards 1527-94 and 1528-93, which define standard practices for conducting Phase I Environmental Site Assessments for real estate transactions.

This EBS is based on: 1) a review of existing Warner Robins records, 2) interviews with private citizens, and City and RAFB officials, 3) on-site inspections of the property, 4) database retrievals from government and third-party sources, and 5) testing of soil samples. This survey considers environmental concerns both within the boundaries of the City property, as well as those around the site perimeter and within a two-mile radius extending from the center of the property.

The City property is 85.46 acres of unimproved land located between Wellborn Road and Georgia Highway 247, in the southeastern portion of the city of Warner Robins. Abutting the property on the east is Georgia Highway 247, beyond which lies the southern industrial area of RAFB. The City of Warner Robins Memorial Park occupies the northeast corner of the property. The western edge of the property is bordered by Wellborn Road and the southeast corner of the West Robins housing area. The southern boundary of the property extends east-west in a straight line extending from the intersection of Wall Street and Wellborn Road.

City records and historical archives indicate that Warner Robins acquired the property from private interests in March 1997. According to the grandson of the previous owner (now deceased), the property had been owned by their family since before the Civil War and has always been farmland. He has no recollection of the land having been farmed since the 1970's, when he was a child, and believes that it may not have been actively farmed since his grandfather's death in 1949. Based on City and previous owner accounts, and review of aerial photographs from as far back as 1937, it appears that no buildings were ever erected on the City property.

The results of the EBS are as follows:

- A search of Federal, State, and local records for the City property revealed no Notice of Violations (NOVs) or other environmental violations.
- No hazardous substances or petroleum products are known to have been released into the environment on the City property. Soil samples were collected from three separate trash piles located in the wooded areas on the western and southern borders of the property

- [analyzed by Toxicity Characteristic Leaching Procedure (TCLP) for metals, volatiles, semivolatiles, pesticides, and herbicides]. In addition, soil samples were collected from the southwestern and northeastern sections of the farm field [analyzed for pesticides and polychlorinated biphenyls (PCBs]. All sample results were below method detection limits.
- A third-party database retrieval from State and Federal agencies identified thirty-four sites of
 environmental concern within a two-mile radius of the center of the City property.
 Databases searched include: US Environmental Protection Agency (US EPA) National
 Priority List (NPL) Sites; US EPA Resource Conservation and Recovery Act (RCRA)
 Corrective Actions and associated permitted treatment, storage, or disposal facilities; State
 Priority List (SPL) Sites; Comprehensive Environmental Recovery Compensation and
 Liability Investigation Sites (CERCLIS/No Further Remedial Action Planned); State
 Underground Storage Tank (UST) and Leaking UST (LUST) sites; and RCRA small and
 large quantity generators.

This EBS did not identify any issues of environmental concern that would impede the sale or transfer of the City property. Although some minor dumping of domestic, construction, and automotive wastes has occurred in isolated areas of the property, soil tests performed as a part of this survey did not identify any regulated substances in underlying soils at concentrations exceeding regulatory action levels. In addition, the soils collected and analyzed from the open field did not identify any regulated substances above action levels. Based on AFI 32-7066, we classify this property as a Category 2.